

**From:** [Thomas Corlett, Sr.](#)  
**To:** [Rankin, Dennis - Washington, DC](#)  
**Cc:** [salparadise1@msn.com](#); [rmc-sdcg-core@lists.sierraclub.org](#)  
**Subject:** Sierra Club Tri State Transmission Comments  
**Date:** Monday, September 21, 2009 1:04:32 PM  
**Attachments:** [SdCGTCLH.pdf](#)  
**Importance:** High

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September 21, 2009 11:00 P.M. Mountain time

Mr. Rankin,

Please find attached comments from the San Luis Valley Citizens Opposed To The Tri State Transmission Project via the Sangre de Cristo Group of the Sierra Club.

I would appreciate a return receipt message.

Thank you,

Tom Corlett  
Energy Chair  
Sangre de Cristo Group  
Rocky Mountain Chapter  
Sierra Club



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**Sangre de Cristo Group**

P.O. Box 8328 Pueblo, CO 81008-8328

Reply to:

**Energy Committee**

8199 Birch Drive Rye, CO 81069

719-489-3050

tom.corlett@rmc.sierraclub.org

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September 15, 2009

Dennis Rankin,  
USDA Rural Utilities Service  
1400 Independence Avenue, SW.  
Washington, DC 20250-1571

Dear Mr. Rankin:

Recently a concerned group of citizens in the San Luis Valley contacted us here at the Sierra Club and asked for support. They voiced some serious concerns in regard to the Tri State High Voltage Transmission Line Project – specifically the Comanche/Calumet portion in Southwest Colorado. The Sierra Club strongly supports them in their efforts to make environmentally sound decisions for the future of renewable energy in the San Luis Valley. We share the concerns of the SLV group and agree that a comprehensive environmental impact analysis is needed. We have summarized the concerns elaborated in their letter, as follows:

1. Solar projects naturally work best when sited close to service area.
2. Tri-State Energy admits that solar energy is a minimal concern. This project seems a clever co-optation of the principles of renewable energy to generate and deliver coal energy.
3. The need for this project has been overstated and is profit-driven. A local, small-scale solution including conservation would work better.
4. The Tri-State project would compromise the intent of the newly designated Sangre de Cristo National Heritage Area.
5. The project threatens wildlife habitat and migratory patterns in numerous ways.
6. The maps presented were incorrect and incomplete. Important features like wetlands, schools, historic sites, even archaeological projects were not taken into account.
7. Property right-of-way issues have been addressed evasively and inadequately.
8. Many property owners have not yet been advised or consulted.
9. The unique natural and cultural character of the San Luis Valley and mountain areas will be disturbed. People living by choice in pristine areas will be displaced and economically harmed.

For the reasons stated above, it is clear that Tri State's perfunctory environmental assessment (EA) needs to be upgraded to a comprehensive Environmental Impact Statement (EIS). Please read the attached letter for details.

Sincerely,

Tom Corlett, Chair  
Energy Committee,  
Sangre de Cristo Group  
Sierra Club

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*Protecting Health and the Environment in Southeastern Colorado for Our Families for Our Future*

September 15, 2009

Dear Mr. Rankin,

We are a group of concerned citizens in the San Luis Valley who are opposed to the Tri State High Voltage Transmission Line Project, as currently proposed for the San Luis Valley. We are, at this time, working with the San Luis Valley Water Protection Coalition within the Solar Working Group to ensure that the Valley makes informed decisions about the development and use of our renewable energy resources and, most importantly, to ensure that environmentally unsound energy projects do not invade the Valley. Listed below are some of our more serious concerns with the Tri State Project.

- N-007-001** 1. Because of the many adverse consequences to the environment the development of solar energy, alone, does not warrant or justify the proposed high voltage transmission line project. In fact, studies show that solar projects work best, and most efficiently, when sited close to the service area.
- N-007-002** 2. Tri State has refused to guarantee that the transmission line project will be reserved exclusively for renewable energy resources and, in the public scoping meetings, we were told that solar energy is only a minimal part of the project. The transmission line project will serve primarily as a delivery service for dirty, coal-generated, energy and some industrial scale solar. It amounts to a clever corporate cooptation of the principles of green-based energy development and is totally unacceptable, as currently presented. Any responsible renewable plan would not compromise the unique natural and cultural characteristics of the San Luis Valley, and surrounding mountains, by introducing a high voltage transmission line component to deliver and further generate the need for dirty energy. A guarantee that this will be an exclusively renewable energy project with conservation at the forefront must be a central part of the final permit.
3. We are concerned that there is a rush to get this project started because of a national movement/trend to shift away from these mammoth transmission line projects to more manageable local delivery systems. We recognize that the current paradigm of large-scale energy production in remote locations, and the subsequent need for large-scale transmission, is not the best short or long-term solution to meet the San Luis Valley energy needs. We would like to promote a local, small-scale, delivery system/microgrid as a backup to the Poncha Pass transmission system, which Tri State informs us, needs to be backed up.

- N-007-003**
- N-007-004** Tri State reports that the SLV, currently served by adjacent 230kV and 115kV lines between the Poncha and SLV Substations, is at risk of voltage collapse during the summer irrigation season and that more capacity is needed to accommodate growth. However, in the same 2008 project study it

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#### **N-007-001: Purpose and Need (In Review)**

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-002: Purpose and Need (In Review)**

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-003: Project Alternatives (In Review)**

Your email/letter/comment form has been received and your comment noted. A range of reasonable project alternatives and mitigation measures including the no action alternative will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-004: Purpose and Need (In Review)**

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

**N-007-004** is concluded that “the total energy requirements in the San Luis Valley have remained steady since 1994.” Also, in building for the summer irrigation season peak, the project will have more electricity to sell on the market during the off-peak season. Interestingly, according to the State Water Engineers Office, a large percentage of irrigation wells are slated for retirement in the next few years. This will mean a drastic reduction in future peak usage. It is obvious that this project does more than meet the San Luis Valley load growth; therefore, “need” is an issue that should be carefully defined and thoroughly researched, which at this time Tri State has neglected to do. They have, according to their *own* study, overstated the “need” for it. Because Tri State has skipped over these important growth facts, conservation as a solution has also been sidestepped. Due to the low load growth in the Valley, conservation should have been considered to better assess the true “need” for electricity in the future.

**N-007-005** It is clear that the Tri State transmission project is not solely designed for generating service of the local, SLV, load and/or for providing regional reliability, but, instead, for a much wider regional and/or national electricity market. This wide market expansion will certainly lead to greater profits for the utility industry but goes well beyond the “need” for the SLV. The reasoning behind the purpose and need for the lines is seriously flawed and profit driven.

**N-007-006** 4. The Alamosa, Conejos, and Costilla counties have recently been designated a National Heritage Area. The Sangre de Cristo National Heritage Area was officially dedicated in August 2009. This designation is intended to help conserve and preserve our unique cultural and environmental features. According to the Heritage Areas, National Park Service website, “Heritage conservation efforts are grounded in a community’s pride in its history and traditions, and in residents’ interest and involvement in retaining and interpreting the landscape for future generations. It offers a collaborative **approach to conservation that does not compromise traditional local control over and use of the landscape.**” Parts of this new National Heritage Area are in the proposed high voltage transmission line project’s proposed corridor. The Tri State project will seriously compromise the intent of this designation; therefore, Tri State needs to address this important legislative development.

**N-007-007** 5. The Tri State Project will result in a loss of wildlife habitat and presents a threat to biodiversity. For example, the San Luis Valley contains many wetland areas in and around the proposed corridor for the transmission lines. The Valley is the home to migratory birds, including the Sandhill cranes, yet Tri State acknowledges that they cannot eliminate the threats posed by their project to these birds or to any of the birds that migrate through or live in the Valley. Tri State literature leads us to the conclusion that the collisions with the lines are inevitable as migratory birds attempt to access the wetland. The massive transmission line project will intrude on the birds’ natural living spaces. This intrusion will expose the birds to predation, keep them from essential activities, or cause them to leave or abandon nests, exposing eggs or chicks to predation or the elements. The intrusion will also interfere with migratory patterns that are centuries old and, up until now, carefully preserved in the SLV. Even so, the Tri State project refuses to consider underground transmission or a smaller scale project.

### **N-007-005: Purpose and Need (In Review)**

Your email/letter/comment form has been received and your comment noted. Project purpose and need will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

### **N-007-006: Cultural, Historic, and Arch (In Review)**

Your email/letter/comment form has been received and your comment noted. Potential impacts to and mitigation measures regarding cultural, historic, and archaeological resources from the proposed project will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

### **N-007-007: Wildlife (In Review)**

Your email/letter/comment form has been received and your comment noted. Potential impacts to wildlife from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

- N-007-008** 6. The maps presented in the public scoping meetings were incomplete and, in some cases, factually incorrect. For example, houses that have been situated in the proposed corridor for as long as 30 years were not indicated on their maps. In addition, wetlands and greenbelt areas, schools, community centers, neighborhoods, historical sites, for example, Garland City, Fort Garland Museum and its ongoing archeological projects, and the Old Taos Trail/Trapper Trail, etc., were obviously not taken into account, and in many cases not even indicated on the maps, when developing the proposed corridor and proposed lines. *Therefore, it is clear that a complete environmental impact study is absolutely essential.* Since a full environmental impact statement has not been completed, which is obvious by the deletions on the maps and discussions with the representatives at the scoping meetings, this project cannot be allowed to proceed without a thorough study.
- N-007-009**
- N-007-010** 7. The project will require massive **new** right-of-ways over the proposed corridor of nearly 95 miles. There are a variety of right-of-way issues that have not been satisfactorily addressed. The ROW required for 230 kilovolt and 345 kilovolt segments would seriously encroach on private and public lands; Tri State is quick to inform property owners that they will determine fair and appropriate compensation but if negotiations are unsuccessful, the companies will have to exercise their eminent domain authority.
- N-007-011** These ROW problems would be ongoing for the life of the massive steel towers or poles and their numerous lines which begs the question of how the land will be prepared, cleared, and maintained, and what permanent and ongoing effects this will have on the natural and cultural environment.
- N-007-012** Not incidentally, water quality is always an issue in the Valley. But, if herbicides are used to clear and maintain the easements the water quality of the valley and its ecosystem, in general, could be irrevocably affected. This is an issue that could be addressed in a full environmental impact statement. The conductors, according to Tri State, can only be 28 feet above the ground, transforming the quality of life for the property owners and wildlife. Tri State informs landowners that activities not permitted within the easements are those that jeopardize the integrity of the structures or reduce the ground-to-line clearance. Beyond this, Tri State was unable to provide landowners specific details because the design details "have not been finalized." Nonetheless, as noted above, the Tri State representatives were quick to inform property owners, in the public scoping meetings, that "the high voltage transmission lines (and their poles or towers) would have to be in *"someone's front yard"* and that "if necessary" eminent domain would be invoked.
- N-007-013** 8. The public scoping process has posed problems, not addressed by Tri State, for our unique population. For example, many of the property owners in the Sangre de Cristo Ranches, a housing subdivision not only in the proposed corridor but on one of the proposed line routes, live out of state or even out of the country. This special group of property owners does not have a fair opportunity, in Tri States public scoping process, to be part of the project record; their concerns will not have a fair hearing because they have not been notified. The first they hear of the project could be when the Tri State organization approaches them for a right of way. Also, property owners throughout the proposed corridor have indicated that they were not informed of the process. Again, with a more thorough study of the area and its distinct cultural and environmental

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### **N-007-008: Correction to Data (In Review)**

Your email/letter/comment form has been received and your comment noted. The information you provided will be verified and project materials will be updated accordingly.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

### **N-007-009: NEPA Process (In Review)**

Your email/letter/comment form has been received and your comment noted. Tri-State Generation and Transmission Association, Inc. has requested financial assistance from the USDA Rural Utilities Service (RUS), for their anticipated ownership interest in the proposed San Luis Valley – Calumet - Comanche Transmission Project. RUS has determined that funding Tri-State's ownership interest is a federal action requiring analysis under the National Environmental Policy Act (NEPA).

RUS is the lead federal agency for NEPA, and will consult with other federal, state, and local agencies, and affiliated tribes as well as adhere to applicable regulations.

Additional information regarding the NEPA process can be found on the RUS project website at <http://www.usda.gov/rus/water/ees/envIRON.htm>. The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

### **N-007-010: Land Rights (In Review)**

Your email/letter/comment form has been received and your comment noted. The process of acquisition of land rights for the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

features, this particular problem of overlooking/ignoring a number of the property owners affected could have been avoided.

**N-007-014** 9. The Valley's relative isolation and historical independence has allowed people to live simple, even off-the-grid, lives; many were living green-based lives before it became a trend in the mainstream population. Retirees with fixed incomes have chosen to live in these heretofore-pristine areas that are now in the proposed corridor for high voltage transmission lines. Industrial scale energy development will surely result in displacing many of these property tax paying residents who will be forced to sell their land below their previous market value further degrading the environment and culture of the Valley. These residents would be much more completely and better served by a local sustainable solution rather than large-scale energy development.

The Sierra Club will continue to support and encourage these concerned SLV citizens to practice and promote the responsible use of the earth's ecosystems and resources while educating and enlisting others to protect the quality of the natural and human environment. For the reasons stated above, it is clear that Tri State's perfunctory environmental assessment (EA) needs to be upgraded to a comprehensive environmental impact statement (EIS).

Sincerely,  
Sally Keller  
SLV Citizens Opposed To Tri State Transmission

#### **N-007-011: Construction (In Review)**

Your email/letter/comment form has been received and your comment noted. Potential impacts from construction of the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-012: Water Resources (In Review)**

Your email/letter/comment form has been received and your comment noted. Potential impacts to water resources from the proposed project and mitigation measures will be addressed in the Environmental Impact Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-013: Public Involvement Process (In Review)**

Your email/letter/comment form has been received and your comment noted. The project is in the planning and environmental review stages. Current project information will be available on the RUS project website, <http://www.usda.gov/rus/water/ees/ea.htm> and the Utilities' project website, <http://www.socotransmission.com/>.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.

#### **N-007-014: Environmental Justice (In Review)**

Your email/letter/comment form has been received and your comment noted. Environmental justice topics and mitigation measures related to the proposed project will be addressed in the Environmental Impact

Statement.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at <http://www.usda.gov/rus/water/ees/ea.htm>.